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Attorneys for Defendant,  
Trans Union, LLC

1 In accordance with the Court's directions at the hearing on February 12, 2015, plaintiff  
2 Sergio L. Ramirez ("Plaintiff") and defendant Trans Union LLC ("TransUnion") have stipulated to  
3 the following procedures for the sending of the class notice (the "Notice").

4 1. The time allowed for opting out of the class shall be forty-five (45) days from the  
5 date of mailing of the Notice. Counsel for Plaintiff estimate that the notice administrator will be  
6 able to mail the Notice to class members by March 15, 2015, but in any event the Notice will  
7 provide a specific opt-out deadline that is at least 45 days after the date the Notice is mailed.

8 2. The Notice shall be substantially in the form of Exhibit A hereto. The notice  
9 administrator will format the Notice so that it is as readable as possible and shall fill in the blanks  
10 with the appropriate website and contact information.

11 Dated: February 13, 2015

Respectfully Submitted,

12 STROOCK & STROOCK & LAVAN LLP  
13 JULIA B. STRICKLAND  
14 STEPHEN J. NEWMAN  
15 BRIAN C. FRONTINO

16 By: /s/ Stephen J. Newman  
17 Stephen J. Newman

18 Attorneys for Defendant  
19 TRANS UNION LLC

20 Dated: February 13, 2015

21 ANDERSON, OGILVIE & BREWER, LLP  
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25 JOHN SOUMILAS

26 By: /s/ Andrew J. Ogilvie  
27 Andrew J. Ogilvie

28 Attorneys for Plaintiff  
SERGIO L. RAMIREZ

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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. JACQUELINE SCOTT CORLEY  
UNITED STATES MAGISTRATE JUDGE

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/s/ *Stephen J. Newman*  
 Stephen J. Newman